

(Del. Rev. 11/14) Pro Se General Complaint Form

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Serry Dewanye Alexander Sr.

(In the space above enter the full name(s) of the plaintiff(s).)

Civ. Action No. **22 - 1488**  
(To be assigned by Clerk's  
Office)

-against-

BMW of North America, LLC - Audi of  
America, LLC - Ford Motors Service  
Company - Porsche Cars North America,  
Inc. - General Motors Company - Volvo Car USA, LLC  
(In the space above enter the full name(s) of the defendant(s).

If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section I. Do not include addresses here.)

COMPLAINT  
(Pro Se)

Jury Demand?

☒ Yes

☐ No

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

If this is an employment discrimination claim or social security claim, please use a different form.

**Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.**

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**I. PARTIES IN THIS COMPLAINT****Plaintiff**

List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff:

Alexander Terry D  
Name (Last, First, MI)

1497 Estill St.  
Street Address

Shelby Memphis TN  
County, City State

38109  
Zip Code

901-730-1364  
Telephone Number

alexanderinventions@gmail.com  
E-mail Address (if available)

**Defendant(s)**

List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant 1:

BMW of North America, LLC  
Name (Last, First)

Corporation Trust Center 1209 Orange St.  
Street Address

New Castle Wilmington DE  
County, City State

19801  
Zip Code

Defendant 2:

Audi of America, LLC  
Name (Last, First)

251 Little Falls Drive  
Street Address

New Castle Wilmington DE  
County, City State

19808  
Zip Code

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**Defendant(s) Continued**

Defendant 3:

Ford Motors Service Company  
Name (Last, First)Corporation Trust Center 1209 Orange St.  
Street AddressNew Castle Wilmington DE  
County, City State19801  
Zip Code

Defendant 4:

Porsche Cars North America, Inc.  
Name (Last, First)CT Corporation 1209 Orange St  
Street AddressWilmington DE  
County, City State19801  
Zip Code**II. BASIS FOR JURISDICTION***Check the option that best describes the basis for jurisdiction in your case:*

- ☐ **U.S. Government Defendant:** United States or a federal official or agency is a defendant.
- ☐ **Diversity of Citizenship:** A matter between individual or corporate citizens of different states and the amount in controversy exceeds \$75,000.
- ☐ **Federal Question:** Claim arises under the Constitution, laws or treaties of the United States.

If you chose "Federal Question", state which of your federal constitutional or federal statutory rights have been violated.

This is an action arising under the patent laws of the United States,  
35 U.S.C. § 1 et seq. Accordingly, this court has subject matter  
jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338 (a)

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**Defendant(s) Continued**

Defendant 5: General Motors Company

Name (Last, First)

251 Little Falls Drive

Street Address

New Castle Wilmington DE 19808

County, City

State

Zip Code

Defendant 6: Volvo Car USA, LLC

Name (Last, First)

Corporation Trust Center 1209 Orange St.

Street Address

New Castle Wilmington DE 19801

County, City

State

Zip Code



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**III. VENUE**

*This court can hear cases arising out of the Counties of New Castle, Kent, and Sussex in the State of Delaware.*

*Under 28 U.S.C § 1391, this is the right court to file your lawsuit if: (1) All defendants live in this state AND at least one of the defendants lives in this district; OR (2) A substantial part of the events you are suing about happened in this district; OR (3) A substantial part of the property that you are suing about is located in this district; OR (4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district. Explain why this district court is the proper location to file your lawsuit.*

Venue is appropriate in this Court because:

*Under 28 U.S.C. § 1400(b), venue is proper in this judicial district at least because each Defendant is incorporated in this district and therefore "resides" in this district.*

**IV. STATEMENT OF CLAIM**

Place(s) of occurrence:

*Across the US, Mexico and Canada*

Date(s) of occurrence:

*2/2/2018*

*State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions.*

**FACTS:**

What happened to you?

*The technology described and claimed in the 861 Patent was developed by Plaintiff Terry Alexander on his own and for used on the ability to provide laminate film technology on and between glass windshield layers to deliver LED and other light capabilities within*

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automobiles for viewing purposes, Plaintiff Jerry Alexander filed for patent protection for his laminate film development on July 16, 2006 and was granted his issued patent on January 11, 2011. Claim 2 of the '861 patent reads as follows: "A device for the display of information from the glass portion or other transparent portion of a vehicle, said device including a power console, a keyboard, and a laminate material applied to a vehicle portion selected from a glass portion and a film applied to a glass portion, wherein said laminate material includes a light emitting material therein arranged to provide a display of letters, designs and any combination thereof, upon activation of said power console, wherein said display of letters, designs, and any combination thereof are arranged through the control of said keyboard, and wherein said laminate material may be placed on any location on said vehicle that includes a glass portion thereof."

SEE  
Exhibit  
A

Was anyone  
else  
involved?

HUD systems within vehicles include, as devices, a glass portion or other transparent portion of a vehicle, a power console, a keyboard, and a laminate material applied to a vehicle portion selected from a glass portion and a film applied to a glass portion. Furthermore, such HUD systems include light emitting materials arranged to provide a display upon activation of said power console and through control of said keyboard. Thus, HUD systems including said laminate material placed on a glass portion thereof reads on the claim elements of the '861 patent. Each of said listed Defendants has incorporated a laminate material-based HUD system within automobiles



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vehicle products manufactured and sold thereby currently and previously.

The '861 Patent has been in full force and effect since its issuance.

Plaintiff Jerry Alexander is informed and believes, and thereon alleges, that Defendants BMW, Audi, Ford Motor Company, Porsche, General Motors and Volvo Motors have infringed and will continue to infringe one or more claims of the '861 Patent in violation of 35 U.S.C. § 271, by among other things, making, using, offering to sell, and/or selling within the United States, supplying or causing to be supplied in or from the United States, and/or importing into the United States, without authority or license, vehicle devices including such HUD systems ("accused vehicles")

Who did  
what?

On information and belief, Plaintiff Jerry Alexander understands that BMW has, in the past, and currently, incorporated HUD systems within X3, and X4 model vehicles at least.

On information and belief, Plaintiff Jerry Alexander understands that Audi has, in the past, and currently, incorporated HUD systems within A4 model vehicles, at least.

On information and belief, Plaintiff Jerry Alexander understands that Ford Motor Company has, in the past, and currently, incorporated HUD systems within F150 model vehicles, at least.

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### Continued FACTS

On information and belief Plaintiff Jerry Alexander understands that Porsche has, in the past and currently, incorporated HUD systems within Cayenne model vehicles, at least.

On information and belief, Plaintiff Jerry Alexander understands that General Motors has, in the past, and currently, incorporated HUD systems within Acadia, Sierra, Terrain, Yukon, Chevrolet Camaro, Chevrolet Corvette, Chevrolet Silverado, Suburban and Chevrolet Tahoe model vehicles, at least.

On information and belief, Plaintiff Jerry Alexander understands that Volvo Motors has, in the past, and currently, incorporated HUD systems within S90, V90 Cross Country, XC60 and XC90 model vehicles, at least.



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**V. INJURIES**

If you sustained injuries related to the events alleged above, describe them here.

Plaintiff Jerry Alexander is informed and believes, and thereon alleges, that each of the listed Defendants has infringed upon '861 Patent by, for example, controlling the design and manufacture of, offering for sale, selling, supplying, and otherwise providing instruction and guidance regarding the above-described accused vehicle products with the knowledge and specific intent to encourage and facilitate infringing uses of HUD systems therein by its customers both inside and outside the United States. As such, since each Defendant has incorporated the infringing HUD systems within accused vehicle products, each is liable, upon information and belief,

**VI. RELIEF**

The relief I want the court to order is:

- ☒ Money damages in the amount of: \$ Two Billion Dollars ← see Exhibit B
- ☒ Other (explain):

WHEREFORE, Plaintiff Jerry Alexander prays for judgment against Defendants BMW, Audi, Ford Motor Company, Porsche, General Motors and Volvo Motors as follows:

A. That Defendants have infringed, and unless enjoined, will continue to infringe, the '861 Patent;

B. That Defendants pay Plaintiff Jerry Alexander damages adequate to compensate Plaintiff for Defendants' infringement of the '861 Patent, together with interest and costs under 35 U.S.C. § 284;

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V. INJURIES

for patent infringement of the '861 patent.  
As a result of Defendants' infringement of the '861  
Patent, Plaintiff Jerry Alexander has been damaged  
and is entitled to recover for damages sustained  
as a result wrongful acts in an amount subject  
to proof at trial.

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VI. RELIEF

C. That Defendants be ordered to pay prejudgment and postjudgment interest on the damages assessed;

D. That Defendants be ordered to pay supplemental damages to Plaintiff Jerry Alexander, including interest, with an accounting as appropriate;

E. That Defendants be enjoined from infringing the '861 Patent, or if their collective infringement is not enjoined, that Defendants be ordered to pay ongoing royalties to Plaintiff Jerry Alexander for any postjudgment infringement of the '861 Patent; and

F. That Plaintiff Jerry Alexander be awarded such other and further relief as this Court deems just and proper.

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**VII. CLOSING**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; and (3) complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

11/14/2022  
Dated

Alexander D. Alexander  
Plaintiff's Signature

Alexander Jerry D  
Printed Name (Last, First, MI)

1497 Estill St. Memphis TN 38109  
Address City State Zip Code

901-730-1364 alexanderinventions@gmail.com  
Telephone Number E-mail Address (if available)

*List the same information for any additional plaintiffs named. Attach additional sheets of paper as necessary.*

**Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.**